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Attorneys for Defendant
HealthSCOPE Benefits, Inc

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

ENLOE MEDICAL CENTER, a
California non-profit public benefit
corporation,

Plaintiff,

v.

HEALTHSCOPE BENEFITS, INC., a
Delaware for-profit corporation; and
DOES 1 THROUGH 25, INCLUSIVE,

Defendants.

Case No. 2:21-cv-01277-TLN-DMC

**STIPULATION AND ORDER TO
CONTINUE PRETRIAL
DEADLINES**

1 **WHEREAS** on July 22, 2021, the Court issued its Initial Pretrial Scheduling
2 Order, setting a deadline of March 17, 2022, for the parties to complete discovery; May
3 16, 2022, for Expert Designation; June 15, 2022, for Rebuttal Expert Designation; July
4 15, 2022, the last day to file Joint Notice of Trial Readiness; and September 13, 2022, the
5 last day to file any dispositive motions.

6 **WHEREAS** Plaintiff Enloe Medical Center (“Plaintiff”) and Defendant
7 HealthSCOPE Benefits, Inc. (“Defendant”) have scheduled a private mediation for
8 August 31, 2022, the earliest date on which the parties and the mediator are available;

9 **WHEREAS** the parties are actively engaged in discovery and require additional
10 time to complete discovery ahead of the scheduled mediation;

11 **WHEREAS** the attorney for Plaintiff primarily responsible for handling this
12 matter recently left Plaintiff’s counsel’s firm requiring transition of the case to a new
13 attorney;

14 **WHEREAS** the parties agree that an extension of the discovery cut-off, expert
15 witness and motion cut-off deadlines would avoid needless expenditures and facilitate an
16 early resolution to this case;

17 **WHEREAS** no trial date has been set for this case, and no party will be prejudiced
18 by extending the pre-trial deadlines.

19 **NOW, THEREFORE**, Plaintiff and Defendant stipulate to extend the discovery
20 cut-off, expert witness designation, rebuttal expert witness designation, joint notice of
21 trial readiness, and motion cut-off deadlines as follows:

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Deadline	Current Date	New Date
Discovery Cut-Off	March 17, 2022	August 18, 2022
Expert Designation	May 16, 2022	October 17, 2022
Rebuttal Expert Designation	June 15, 2022	November 14, 2022
Joint Notice of Trial Readiness	July 15, 2022	December 16, 2022
Last day to file dispositive motions	September 13, 2022	February 14, 2023

IT IS SO STIPULATED.

Dated: June 1, 2022

**LAW OFFICES OF STEPHENSON,
ACQUISTO & COLMAN, INC.**

By: /s/ Barbara V. Lam

Barbara V Lam

Attorneys for Plaintiff
Enloe Medical Center

Dated: June 1, 2022

WALRAVEN & WESTERFELD LLP

By: /s/ Bryan S. Westerfeld

Bryan S. Westerfeld

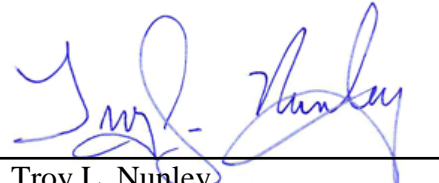
Attorneys for Defendant
HealthSCOPE Benefits, Inc.

ORDER

The Court, having received, read, and considered the stipulation of the parties, and good cause appearing therefrom, adopts the stipulation of the parties in its entirety as its order.

IT IS SO FOUND AND ORDERED.

Dated: June 1, 2022



Troy L. Nunley
United States District Judge